

Counsel at end of document

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING, an agency of the State of California,	)	Case No. C 07-3747 PJH
	)	
Plaintiff,	)	STIPULATION AND [PROPOSED]
	)	ORDER RE EXPERT DISCLOSURE,
and,	)	DISCOVERY, AND DISPOSITIVE
	)	MOTIONS
STEVEN J. CARAUDDO,	)	
	)	
Plaintiff-Intervenor,	)	
	)	
vs.	)	
	)	
LUCENT TECHNOLOGIES, INC., and; DOES	)	
ONE through THIRTY, Inclusive,	)	
	)	
Defendants.	)	

**STIPULATION**

Defendant Lucent Technologies, Inc., plaintiff Department of Fair Employment and Housing and plaintiff-intervenor Steven Carauddo, collectively referred to herein as “parties” jointly stipulate as follows:

1           1.       This Court's Amended Case Management and Pretrial Order dated October 31, 2007  
2 set forth a pretrial schedule including the following dates:

3                   Disclosure of Experts (retained and non-retained): August 6, 2008;  
4                   Expert and Non-Expert Discovery Cutoff: September 24, 2008; and,  
5                   Dispositive Motions to Be Heard by: November 19, 2008.

6           2.       The parties agree that it would be beneficial to extend the above deadlines by 30 days  
7 in order to effectively conduct the disclosure, discovery, and motion work that is needed for trial;

8           3.       Lucent stipulates to the extensions of the disclosure and discovery deadlines only if  
9 the court also orders that the deadline for hearing of dispositive motions is also extended.

10          4.       Therefore, the parties request that this court extend the dates for disclosure of experts,  
11 discovery cutoff, and dispositive motions as follows:

<u>Deadline</u>	<u>Proposed Extended Date</u>
12 Disclosure of Experts (retained and non-retained)	Friday, September 5, 2008
13 Non-expert and Expert Discovery Cutoff	Friday, October 24, 2008
14 Dispositive Motions	Wednesday December 17, 2008

16  
17 **SO STIPULATED:**

18 Dated: July 24, 2008

DEPARTMENT OF FAIR EMPLOYMENT  
AND HOUSING

TIMOTHY M. MUSCAT  
Chief Counsel

SUSAN SAYLOR  
Senior Staff Counsel

23  
24 By: /s/ Susan Saylor

25 \_\_\_\_\_  
Susan Saylor  
Attorneys for plaintiff, DFEH

1 Dated: July 24, 2008

BOXER & GERSON, LLP

2  
3  
4 By: /s/ Jean K. Hyams

5 Jean K. Hyams  
6 Counsel for Steven Carauddo

7 Dated: July 24, 2008

8 EPSTEIN BECKER & GREEN, P.C.  
9 STEVEN R. BLACKBURN  
LESLIE J. MANN

10 By: /s/ Leslie J. Mann

11 Leslie J. Mann  
12 Attorney for defendant  
13 LUCENT TECHNOLOGIES INC.

14  
15 **ORDER**

16 The time for completion of disclosure of experts, discovery cutoff, and dispositive motions as  
17 ordered by the court in its Amended Case Management and Pretrial Order shall be extended; the new  
18 deadlines are:

19 Disclosure of Experts (retained and non-retained): September 5, 2008;

20 Expert and Non-Expert Discovery Cutoff: October 24, 2008; and,

21 Dispositive Motions to Be Heard by: December 17, 2008.

22 Dated: \_\_\_\_\_

23 Honorable Phyllis J. Hamilton  
24 United States District Court Judge

1 TIMOTHY M. MUSCAT (#148944)

Chief Counsel

2 SUSAN SAYLOR

Senior Staff Counsel

3 DEPARTMENT OF FAIR EMPLOYMENT

AND HOUSING, Oakland Legal Unit

4 1515 Clay Street, Suite 701

Oakland, CA 94612-1460

5 Telephone: (510) 873-6457

Facsimile: (510) 873-0840

6 E-mail: Susan.Saylor@dfeh.ca.gov

7 Attorneys for Plaintiff, DFEH

8 BOXER GERSON, LLP

Jean K. Hyams, State Bar No. 144425

9 300 Frank H. Ogawa Plaza, #500

Oakland, CA 94612-2040

10 Telephone: (510) 835-8870

Facsimile: (510) 835-0415

11 Email: jhyams@boxerlaw.com

12 THE VINICK LAW FIRM

Sharon Vinick State Bar No. 129914

13 350 Sansome Street Suite 350

San Francisco, California 94114

14 Telephone: 415.722.4481

15 Facsimile: 415.276.6338

Attorneys for Real Party in Interest

16 STEVEN J. CARAUDDO

17 Steven R. Blackburn, State Bar No. 154797

Leslie J. Mann, State Bar No. 95467

18 EPSTEIN BECKER & GREEN, P.C.

One California Street, 26th Floor

19 San Francisco, California 94111-5427

20 Telephone: 415.398.3500

Facsimile: 415.398.0955

sblackburn@ebglaw.com

21 lmann@ebglaw.com

Attorneys for Defendant

22 LUCENT TECHNOLOGIES INC.

23

24

25

26

27

